

EASTERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

Plaintiff(s),

vs.

INTERNATIONAL LONGSHOREMEN'S,
ASSOCIATION, AFL-CIO, et. al.

Defendant(s).

* ECF CASE
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* Civil Action No.:
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* 05-CV-3212 (ILG)(VVP)
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OBJECTIONS AND RESERVATIONS

A. The defendant, Harold J. Daggett asserts the following general objections and reservations and incorporates the same into each response to Interrogatories.

The plaintiff's demands are objected to since they call for the disclosure of information that may concern

(i) Attorney-client privilege or any other privilege to this defendant.

B. This defendant objects to the Interrogatories proponded by plaintiff since they are overly broad and lack specificity.

C. This defendant objects to the Interrogatories of plaintiff since they require the production of documents which are not in the custody of this defendant and may be obtained by plaintiff from sources other than this defendant.

D. This defendant objects to the Interrogatories propounded by plaintiff since they exceed the time period alleged in the Complaint.

E. This defendant objects to the Interrogatories since in at least one instance the question makes no sense.

F. This defendant asserts that the Interrogatories propounded by the Plaintiff are inconsistent with local rule 26.3.

G. This defendant adopts any general or specific objection asserted by any other defendant in this action.

Respectfully submitted,
DAGGETT, KRAEMER, ELIADES,
VANDERWIELE & URSIN, ESQS.

s/George T. Daggett

BY: GEORGE T. DAGGETT